## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

RICHARD W. NAGEL CLERK OF COURT

UNITED STATES OF AMERICA,

Plaintiff.

VS.

WILLIAM E. YOUNG,

Defendant.

CASENO. 17 Cr US

Judge Graham

INDICTMENT

18 U.S.C. § 2261A(2)

THE GRAND JURY CHARGES:

<u>COUNT 1</u> 18 U.S.C. § 2261A(2): Cyberstalking

From in or about March 2008 through the date of this Indictment, the exact dates being unknown, in the Southern District of Ohio and elsewhere, the defendant, WILLIAM E. YOUNG, with the intent to harass and intimidate, and place under surveillance with the intent to harass and intimidate, used the mail, an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate and foreign commerce, namely, the mail and the Internet, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to R.M. and his spouse, J.M., and placed R.M. and J.M. in reasonable fear of death or serious bodily injury.

All in violation of 18 U.S.C. § 2261A(2).

A TRUE BILL

S/Foreperson

**FOREPERSON** 

BENJAMIN C. GLASSMAN UNITED STATES ATTORNEY

JESSICA H. KIM (0087831)

**Assistant United States Attorney** 

THE